

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	
	:	
- v. -	:	
	:	<u>BILL OF PARTICULARS</u>
BENJAMIN CHOW,	:	17 Cr. 667 (GHW)
a/k/a “Ben Chow Zhou Bin,”	:	
a/k/a “Benjamin Bin Chow,”	:	
a/k/a “Bin Zhou,”	:	
	:	
Defendant.	:	
	:	
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Pursuant to the Court’s February 12, 2018 order, the Government hereby supplements the particulars set forth in the Indictment in the above-captioned case with additional particulars set forth below concerning: (a) the identity of known co-conspirators; and (b) trading activity that the Government intends to introduce in connection with Count One of the Indictment and the scheme charged in Count Fourteen of the Indictment, as well as trading activity in connection with Cypress Semiconductor Corporation.

The information set forth below is based on the current state of the evidence and the Government’s review and analysis of the evidence to date. Certain answers are based, in part, on inferences drawn from documents and other evidence in the case. As the Government continues to review and analyze the evidence, the Government reserves the right to draw other reasonable inferences from the evidence and, where appropriate, seek leave of the Court to amend this Bill of Particulars.

Known Co-Conspirators

Michael Yin, a/k/a “Shaohua Yin”

Fang Wei

Additional Trades in Lattice Semiconductor Corporation

In addition to the trades already referenced in the Indictment, the Government hereby gives notice that it intends to introduce evidence of the following trades at trial in support of Counts One and Fourteen. All trades listed below that occur before or after the charged timeframe of Counts One and Fourteen as set forth in the Indictment the Government intends to introduce as direct evidence and for relevant context. All trades listed below that occur during the charged timeframe of Counts One and Fourteen are direct evidence and trades in furtherance of the conspiracy. Dates and amounts are approximate:

Trading in Lattice Through Michael Yin Nominee Accounts

TRADE DATE	NAME	STOCK	BUY QUANTITY	SELL QUANTITY
11/9/2015	Zhiqing Yin	Lattice	150,000	
11/10/2015	Zhiqing Yin	Lattice	67,301	217,301
12/2/2015	Zhiqing Yin	Lattice	64,700	
2/24/2016	Zhiqing Yin	Lattice		64,700
5/2/2016	Zhiqing Yin	Lattice	189,800	
5/4/2016	Zhiqing Yin	Lattice		23,186
5/9/2016	Zhiqing Yin	Lattice		95,000
6/21/2016	Zhiqing Yin	Lattice		37,700
7/12/2016	Jun Qin	Lattice	53,500	
7/20/2016	Jun Qin	Lattice		53,500
11/3/2016	Bei Xie	Lattice		125,000
11/3/2016	Jun Qin	Lattice		665,289
11/3/2016	Lizhao Su	Lattice		1,462,104
11/3/2016	Yan Zhou	Lattice		210,000
11/3/2016	Zhiqing Yin	Lattice		1,273,535
11/10/2016	Zhiqing Yin	Lattice	13,334	

TRADE DATE	NAME	STOCK	BUY QUANTITY	SELL QUANTITY
11/18/2016	Lizhao Su	Lattice	278,906	
11/22/2016	Lizhao Su	Lattice	75,774	
11/23/2016	Jun Qin	Lattice	100,000	
11/23/2016	Lizhao Su	Lattice	150,000	
1/18/2017	Bei Xie	Lattice	46,100	
1/18/2017	Yan Zhou	Lattice	46,605	
1/18/2017	Zhiqing Yin	Lattice	11,949	
1/19/2017	Bei Xie	Lattice	79,982	
1/19/2017	Yan Zhou	Lattice	79,900	
1/19/2017	Zhiqing Yin	Lattice	55,500	
1/20/2017	Zhiqing Yin	Lattice	100,000	
1/23/2017	Jun Qin	Lattice	100,000	
1/23/2017	Zhiqing Yin	Lattice	320,000	
1/24/2017	Lizhao Su	Lattice	184,236	
1/25/2017	Bei Xie	Lattice	40,032	
1/25/2017	Jun Qin	Lattice	31,900	
1/25/2017	Yan Zhou	Lattice	21,700	
1/26/2017	Jun Qin	Lattice	48,400	
1/26/2017	Lizhao Su	Lattice	30,200	
1/26/2017	Zhiqing Yin	Lattice	24,900	
1/27/2017	Jun Qin	Lattice	26,048	
1/27/2017	Lizhao Su	Lattice	37,300	
1/27/2017	Zhiqing Yin	Lattice	40,581	
1/30/2017	Jun Qin	Lattice	100,000	
1/30/2017	Lizhao Su	Lattice	100,000	
2/1/2017	Lizhao Su	Lattice	100	
2/6/2017	Bei Xie	Lattice		166,114
2/6/2017	Jun Qin	Lattice		295,331
2/6/2017	Lizhao Su	Lattice		254,217
2/6/2017	Yan Zhou	Lattice		118,522
2/6/2017	Zhiqing Yin	Lattice		220,411
2/7/2017	Jun Qin	Lattice		230,041
2/7/2017	Lizhao Su	Lattice		192,736
2/7/2017	Yan Zhou	Lattice		29,683
2/7/2017	Zhiqing Yin	Lattice		223,974
2/8/2017	Jun Qin	Lattice		673,457
2/8/2017	Lizhao Su	Lattice		267,909
2/8/2017	Zhiqing Yin	Lattice		321,548

TRADE DATE	NAME	STOCK	BUY QUANTITY	SELL QUANTITY
2/9/2017	Lizhao Su	Lattice		8,900
2/9/2017	Zhiqing Yin	Lattice		8,100

Trading in Lattice by Fang Wei

TRADE DATE	NAME	STOCK	BUY QUANTITY	SELL QUANTITY
10/17/2016	Fang Wei	Lattice	10,000	
10/19/2016	Fang Wei	Lattice		5,000
11/8/2016	Fang Wei	Lattice		5,000

Trades in Cypress Semiconductor Corporation

The Government intends to offer evidence of the following transactions as direct evidence and pursuant to Federal Rule of Evidence 404(b), as previously noticed by the Government.

Trading in Cypress Through Michael Yin Nominee Accounts

TRADE DATE	NAME	STOCK	BUY QUANTITY	SELL QUANTITY
8/17/2016	Zhiqing Yin	Cypress	300,000	
8/18/2016	Zhiqing Yin	Cypress	99,385	
8/19/2016	Zhiqing Yin	Cypress	100,000	
9/9/2016	Lizhao Su	Cypress	100,000	
10/17/2016	Zhiqing Yin	Cypress		5,500
10/18/2016	Lizhao Su	Cypress		100,000
10/18/2016	Zhiqing Yin	Cypress		293,885
10/21/2016	Zhiqing Yin	Cypress		100,000

In addition to the transactions referenced above, the Government reserves the right to introduce evidence of other transactions in its case-in-chief or on its rebuttal case in response to

arguments or evidence introduced by the defendant on cross-examination of the Government's witnesses or during the defense case.

Dated: New York, New York
February 22, 2018

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